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May 21, 2004

VIA FEDERAL EXPRESS

Mr. Peter Mannino
Emergency and Remedial Response Division
U.S. Environmental Protection Agency, Region II
290 Broadway, 19th Floor
New York, NY 10007


Re: *104(e) Request for Information*
Cornell-Dubilier Electronics, Inc. Site
Middlesex County New Jersey
Our File No.: 03341.49329

Dear Mr. Mannino:

We represent Gavazzi Tire, Inc. (Gavazzi Tire) in connection with the captioned matter. Enclosed please find an original and one copy of Gavazzi Tire's response to USEPA's request for information regarding the Cornell Dubilier Electronics, Inc. Site.

If you have any questions, please do not hesitate to contact us.

Very truly yours,



Charles J. Stoia

CJS:ko

Enclosure

cc: Sarah Flanagan, Esq. (Via FedEx w/enc.)
Assistant Regional Counsel

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GAVAZZI TIRE'S RESPONSE TO USEPA'S
REQUEST FOR INFORMATION
Former Cornell-Dubilier facility
333 Hamilton Boulevard
South Plainfield, New Jersey

Page 7, #1

A. Gavazzi Tire, Incorporated ("Gavazzi Tire") 402 Wicklow Way, Bridgewater, NJ 08807-3743

B. Robert O. Gavazzi is the current President, Treasurer and Secretary of Gavazzi Tire.

C. Gavazzi Tire is a New Jersey corporation incorporated in 1967. Daniel C. Soriano, 90 Grove Street, Somerville, NJ, 908-725-1962 is the corporate agent.

D. Gavazzi Tire does not have any subsidiaries or affiliates. Gavazzi Tire is not a subsidiary of any organization nor does any organization have any affiliation with Gavazzi Tire.

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Gavazzi Tire also trades as "Gavazzi Auto Tire and Auto Center."

Page 7, #3

Gavazzi Tire does not have an EPA identification number.

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Gavazzi Tire leased and occupied a 3300 square-foot portion of the front of a small building that fronted Hamilton Boulevard. The street address of this location was 333 Hamilton Boulevard and comprised approximately 1 percent of the total complex's area. The initial lease for the premises was managed by Bissel Realty. Gavazzi Tire does not have copies of any leases relating to the site.

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Gavazzi Tire has never had any RCRA permits during time of lease or at any time.

Page 8, #6

The Gavazzi Tire leased location was used for installation of tires for passenger cars, light and large trucks. The location had two truck tire service trucks, fully equipped with an air compressor to provide tire service on the road or at the truck fleet locations. The off premises road service business accounted for approximately 50% of the location's business. The on-site servicing of the passenger car and light truck tires accounted for approximately 10% of the location's business. County and government business, which included

installation and delivering new tires and tubes to these government organizations, accounted for approximately 40% of the activity of this location.

No other activities, including any type of auto servicing or repair, manufacturing, research and development, processing and/or handling, were conducted at the site.

The person in charge of shop activities was manager Eric Schultz. Eric Schultz's last address was in the South Jersey, shore area.

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SHOP PRODUCTS FOR SERVICING TIRES

The products listed below were used for servicing tires at the site.

Cold Vulcanizing Fluid – 8 oz. metal cans

This product was used for tube repair and the plugging of nail hole repairs in tubeless tires. Monthly use for this fluid was 6 to 8 cans per month. This product is made in Germany.

Liquid Pre-Buff Cleaner – 32 oz. metal can

This product was used to prepare a tubeless tire repair where an air buffer is not available or the air buffer can't get to the injured area inside the tire. The air buffer is always used otherwise, since it is easier to use and does a better job. Monthly use for this product was 1-2 cans per month or 12 cans per year. The product is made in Germany.

E-Z Mount Paste Lubricant – 8-pound plastic pail

This product was used to lubricate the tire's beads for the installation of a tire without damaging the tire's bead area. A similar product, "Murphy's Mounting Soap" was also used.

Ultra Lube – 8-Pound plastic pail

This product was used to mount tubeless tires to prevent an air leak at the tubeless tire bead. A similar product, "No Rim Rust" was also used.

Rema Tube Patches for tube or tubeless tire repairs – 50 per box

Rema Tire Patches for the repair of larger repairs in tires – 10 per box

Four (4) to five (5) 100 pound bags of calcium chloride were stored and used to help weigh down trucks used to deliver tractor tires at customer's job sites. The calcium chloride was purchased from Agway, Home Depot or similar type of vendor as needed.

All of the above products were stored on shelves, in a storage room. Some were included as inventory in the cabs of the two service trucks. Empty product cans were disposed of in the Colbath Garbage Disposal, New Market Road, Piscataway, NJ.

The only scrap products that were generated in the service that was provided were scrap tires. Most old tires were returned to all trucking accounts where they would be reused on road or storage trailers. In the case of government shops, tires were returned for their product inventory controls and to make sure the decision to replace tires was correct and for

payment verification. Other scrap tires like retail scrap tires and were estimated at 200 to 300 per year were taken to the Edgeboro Landfill located in East Brunswick, Middlesex County.

Colbath Garbage Disposal (Colbath) conducted our solid waste disposal for paper and office refuse. Colbath was located in Piscataway, New Jersey.

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No sampling or analyses were performed at the site.

Page 8, #9

The only products that Gavazzi Tire stored, handled or used are identified above.

Page 8, #10

The only products that Gavazzi Tire stored, handled or used are identified above.

Page 9, #11

The only products that Gavazzi Tire stored, handled or used are identified above.

Page 9, #12

The only products that Gavazzi Tire stored, handled or used are identified above.

Page 9, #13

There were no leaks or spills at site.

Page 9, #14

No excavation was ever conducted at the site.

Page 9, #15

No lagoons, impoundments or storage tanks were present at the site.

Page 9, #16

Gavazzi Tire operated a clean, well-maintained space and conducted off-site sales, delivery and service of tires to truck fleets and government organizations at their sites.

Page 10, #17

Gavazzi Tire is not aware of any such contracts or leases.

Page 10, #18

Gavazzi Tire is unable to locate copies of any applicable insurance policies.

Page 10, #19

Not applicable.

Page 11, #20

No such information or documents are known or available.

Page 11, #21

Robert Gavazzi, 402 Wicklow Way, Bridgewater, 08807, 908-725-2447, retired (71 years old) tire dealer and president of Gavazzi Tire.

Page 11, #22

No other individuals are known.

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATIONState of New JerseyCounty of Somerset

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

ROBERTO GAVAZZI

NAME (Print or Type)

PRES.

TITLE (Print or Type)

Robert O. Gavazzi

SIGNATURE

Sworn to before me this

7th day of May, 2004Karen Haren

NOTARY PUBLIC

KAREN HAREN

Notary Public of New Jersey

My Commission Expires August 23 2008